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PLEASE RESPOND TO WASHINGTON ADDRESS

February 12, 2019

***VIA ECFS***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

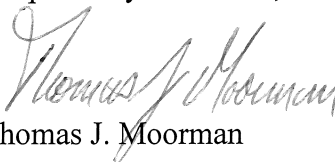
**Re: EB Docket No. 06-36  
Section 64.2009(e) CPNI Certification  
Southern Telecommunications Co., LLC (Form 499-A Filer ID No. 825044)**

Dear Ms. Dortch:

Attached for filing is the Section 64.2009(e) Customer Proprietary Network Information certification and accompanying statement covering the prior calendar year 2018 of Southern Telecommunications Co., LLC (Form 499-A Filer ID No. 825044).

Please contact the undersigned should you have any questions or require additional information.

Respectfully submitted,

  
Thomas J. Moorman

Attachment



**Annual 47 CFR § 64.2009(e) CPNI Certification Template**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: 2/12/2019
2. Name of company(s) covered by this certification: Southern Telecommunications Co LLC
3. Form 499 Filer ID: 825044
4. Name of signatory: David P. Goodwin
5. Title of signatory: CEO
6. Certification:

I, David P. Goodwin, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 CFR § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

A handwritten signature in black ink, appearing to read "David P. Goodwin", is written over a horizontal line.

**Attachments:** Accompanying Statement explaining CPNI procedures

P. O. Box 12865 Jackson, MS 39236  
Phone: 601-981-8888 or Fax: 601-981-8729

**SOUTHERN TELECOMMUNICATIONS COMPANY, LLC**

**499 Filer ID 825044**

**P. O. Box 12865 Jackson, MS 39236 877-476-8843**

**2019 CERTIFICATION ATTACHMENT FOR CALENDAR YEAR 2018  
ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE  
February 12, 2019**

This statement accompanies the Company's 2019 Customer Proprietary Network Information ("CPNI") Certification, for calendar year 2018, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

*All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.*

**1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

**2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

**5. Customer Notification and Authorization Process**

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

# **SOUTHERN TELECOMMUNICATIONS COMPANY, LLC**

**499 Filer ID 825044**

## **6. Record of Customer CPNI Approval/Non-Approval**

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

## **7. Procedures Protecting Against Disclosure of CPNI**

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:\*

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company has implemented procedures to notify customers of account changes.

\*The Company does not provide customers with on-line access to customer account information.

## **8. Actions Taken Against Data Brokers and Responses to Customer Complaints**

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

<u>Not applicable.</u>	No actions taken against data-brokers.
	No customer complaints received.

## **9. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

## **10. Supervisory Review Process for Outbound Marketing**

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

## **11. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.